

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
(ALEXANDRIA)**

|                     |   |                                  |
|---------------------|---|----------------------------------|
| <b>IN RE:</b>       | ) |                                  |
|                     | ) |                                  |
| <b>MIN SIK KANG</b> | ) | <b>Case No. 10-18839-RGM</b>     |
| <b>MAN SUN KANG</b> | ) | <b>Jointly Administered with</b> |
|                     | ) | <b>Case No. 11-10200</b>         |
| <b>Debtors.</b>     | ) | <b>Chapter 11</b>                |

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**MOTION FOR LEAVE TO FILE A PROOF OF CLAIM AFTER FILING DEADLINE**

COMES NOW Yeon Han, Kyong Chun Chu, Jack Kim, Il Hwan Kim, Ki Yoon, Sun Kyung Lim and 7 Investment, LLC, interested parties in this proceeding (the “Movants”), by and through Counsel, and move this Court for leave to file a proof of claim after the filing deadline in the above styled matter and states as follows:

1. Min Sik Kang and Man Sun Kang (“Debtors”) filed a voluntary petition for bankruptcy under Chapter 11 in the United States Bankruptcy Court, Eastern District of Virginia (Alexandria Division) on October 19, 2010.
2. The Movants are members of 7 Investment, LLC (“7 Investment”), which has an equitable interest in several business entities owned by the Debtors, namely, Grand Mart, Inc. referred to herein as “Alexandria Grand Mart;” Grand Mart International Food, LLC, referred to herein as “Sterling Grand Mart;” and Lucky World - Gaithersburg, Inc. referred to herein as “Lucky World.”

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Counsel for Movants

3. Some or all of the Movants purchased interests in businesses owned by the Debtors.

4. The Debtors filed their petition and schedules but failed to list the Movants as creditors. Therefore, the Movants did not receive timely notice of the Debtors' bankruptcy filing and were unable to file their proof of claims before the February 22, 2011 deadline.

5. The Examiner appointed in this case seeks to avoid transfers by the Debtors to the Movants.

6. The Movants should have received timely notice of the bankruptcy petition but did not and are therefore requesting that the court treat the Movants' proofs of claim as timely filed.

WHEREFORE, the Movants respectfully request that this Court grant the Movants' requested relief to allow the filing of proofs of claim by Yeon Han, Kyong Chun Chu, Jack Kim, Il Hwan Kim, Ki Yoon, Sun Kyung Lim and 7 Investment, LLC; deem such filings as timely filed; and grant any other relief this court finds just and proper.

Date: November 18, 2011

Respectfully submitted,

**OFFIT KURMAN, P.A.**

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of November, 2011, to the creditors on the Court's official mailing matrix and, to the extent that the following persons were not served electronically via the CM/ECF system, a copy of the foregoing was mailed, first class mail, postage prepaid, to the following:

Min Sik Kang  
Man Sun Kang  
9378 Colbert Court  
Fairfax, VA 22032

Office of the U.S. Trustee  
115 South Union Street, Suite 210  
Alexandria, VA 22314

Michael Tully Driscoll, Esquire  
Office of the U.S. Trustee  
115 South Union Street, Suite 210  
Alexandria, Virginia 22314

Unsecured Creditors Committee  
c/o Brad Englander, Esq.  
Whiteford, Taylor & Preston  
3190 Fairview Park Drive, Suite 300  
Falls Church, VA 22042

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4716 Benjamin Cross Court  
Chantilly, VA 20151

Ki Yoon  
5749 Solheim Cup Drive  
Haymarket, VA 20169

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13676 Sweet Woodruff Lane  
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